



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

NOV 13 2019

REPLY TO THE ATTENTION OF

**CERTIFIED MAIL 7017 2400 0000 7816 9936**  
**RETURN RECEIPT REQUESTED**

Mr. Richard S. Gilbert  
Plant Manager  
Pamarco Global Graphics, Incorporated  
125 Flinn Street  
Batavia, Illinois 60510

Re: Notice of Violation  
Compliance Evaluation Inspection  
ILD 005 215 116

Dear Mr. Gilbert:

On September 10, 2018, a representative of the U.S. Environmental Protection Agency inspected Pamarco Global Graphics, Incorporated (Pamarco) located in Batavia, Illinois (EPA Inspection). On February 13, 2019, a representative of the Illinois Environmental Protection Agency (Illinois EPA) inspected Pamarco located in Batavia, Illinois (Illinois EPA Inspection). As a large quantity generator of hazardous waste, Pamarco is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the two inspections was to evaluate Pamarco's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. Copies of the inspection reports are enclosed for your reference.

Based on information provided by Pamarco, EPA's and Illinois EPA's review of records pertaining to Pamarco, and the inspectors' observations, EPA has determined that Pamarco has unlawfully stored hazardous waste without a permit or interim status as a result of Pamarco's failure to comply with certain conditions for a permit exemption under Ill. Admin. Code tit. 35 § 722.134(a)-(c) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the permit exemption conditions with which Pamarco was out of compliance at the time of the inspections in paragraphs 1 - 6, below.

EPA has also determined that Pamarco violated RCRA requirements related to waste determination recordkeeping and annual reporting, as described in paragraphs 7 - 8, below.



## STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS

### 1. Hazardous Waste Accumulation Container Requirements

Under 35 IAC § 722.134(b), a large quantity generator who accumulates hazardous waste for more than 90 days is an operator of a storage facility and is subject to the TSD requirements.

At the time of the EPA and Illinois EPA Inspections, Pamarco was accumulating hazardous waste in several containers and two tanks for more than 90 days.

### 2. When Each Period of Accumulation Begins

Under Ill. Admin. Code tit. 35 § 722.134(a)(2), a large quantity generator must clearly mark each container holding hazardous waste with the date upon which each period of accumulation begins.

At the time of the Illinois EPA Inspection, Pamarco was accumulating hazardous waste in one container without the accumulation start date. Pamarco marked the container with an accumulation start date during the inspection.

Many of the conditions for a RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its permit exemption due to a failure to comply with an exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption conditions identified in paragraphs 3 - 6 are also independent TSD requirements incorporated from Ill. Admin. Code tit. 35 Part 725. Accordingly, each failure of Pamarco to comply with these conditions is also a violation of the corresponding requirement in Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265].

## STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

At the time of the inspection, Pamarco was out of compliance with the following large quantity generator permit exemption conditions:

### 3. Personnel Training

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program

must be directed by a person trained in hazardous waste management procedures and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(a). Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility and must take part in an annual review of this initial training thereafter. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(b) and (c).

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- a. The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- b. A written job description for each position at the facility related to hazardous waste management;
- c. A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and
- d. Records that document that the training or job experience described above has been given to and completed by facility personnel. *See* Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.116(d).

At the time of the EPA and Illinois EPA Inspections, Pamarco did not have a training program that was directed by a person trained in hazardous waste management procedures and that included instruction which teaches facility personnel hazardous waste management procedures (including contingency plan implementation).

At the time of the EPA and Illinois EPA Inspections, Pamarco had not provided several facility personnel with initial training within six months after their effective date of assignment.

At the time of the EPA and Illinois EPA Inspections, Pamarco had not provided several facility employees with an annual review of the initial training.

#### 4. Storage Tank Requirements

Under Ill. Admin. Code tit. 35 §§ 722.134(a)(1)(B) and 725.292, a large quantity generator must obtain a written assessment reviewed and certified by a Professional

Engineer attesting that the tank system has sufficient structural integrity and is acceptable for the storing and treating of hazardous waste.

At the time of the EPA and Illinois EPA Inspections, Pamarco had not obtained written assessments for two hazardous waste storage tanks being used to accumulate hazardous waste in the Plating Area.

Under 35 IAC §§ 722.134(a)(1)(ii) and 725.295(g), a large quantity generator must inspect, where present, at least each operating day, data gathered from monitoring and leak detection equipment to ensure good working order and detect corrosion and/or releases of waste. A large quantity generator must document the daily inspections in the operating record of the facility.

At the time of the EPA and Illinois EPA Inspections, Pamarco had not documented daily inspections for the two hazardous waste storage tanks in the Plating Area.

#### 5. Container Requirements

Under 35 IAC §§ 722.134(a)(1)(i) and 725.274, a large quantity generator must inspect, at least weekly, areas where hazardous waste containers are stored. The owner or operator must look for leaking containers and deterioration of containers.

At the time of the EPA Inspection, Pamarco was not inspecting containers holding hazardous waste that were in the less than 90-day storage area.

#### 6. Contingency Plan

A large quantity generator of hazardous waste must have a contingency plan that is designed to minimize hazards to human health and the environment from fires, explosions, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water. *See Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.151(a).* A large quantity generator must have a Contingency Plan that lists names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator and this list must be kept up to date. Where more than one person is listed, one must be named as primary emergency coordinator and others must be listed in the order in which they will assume responsibility as alternates. *See Ill. Admin. Code tit. 35 §§ 722.134(a)(4) and 725.152(d).*

At the time of the EPA Inspection, Pamarco did not have a contingency plan with a current list of names of the persons qualified to act as emergency coordinators. The persons listed as the Primary and Alternate Emergency coordinators had not been employed by Pamarco for several years.

By failing to comply with the conditions for a permit exemption above, Pamarco became an operator of a hazardous waste storage facility and was required to obtain an Illinois hazardous waste storage permit. Pamarco failed to apply for such a permit. Pamarco's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Ill. Admin. Code tit. 35 §§ 703.121(a) and (b); 703.180(c); and 705.121(a) [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a permit exemption condition incorporated from Ill. Admin. Code tit. 35 Part 725 [40 C.F.R. Part 265] is also an independent violation of the corresponding TSD requirement.

At this time, EPA is not requiring Pamarco to apply for an Illinois hazardous waste storage permit so long as it immediately establishes compliance with the conditions for a permit exemption outlined in paragraphs 1-6, above.

#### **OTHER VIOLATIONS**

Finally, EPA has also determined that Pamarco violated RCRA requirements related to recordkeeping and reporting, as described in paragraphs 7 - 8, below.

##### **7. Hazardous Waste Annual Reports**

Under 35 IAC § 722.141(a)(5), a large quantity generator that ships any hazardous waste off-site to a treatment, storage or disposal facility (TSDF) must submit a single copy of an annual report to the Illinois Environmental Protection Agency by March 1 which covers generator activities during the previous year and must include a description, EPA hazardous waste number and quantity of each hazardous waste shipped off-site to TSDFs.

At the time of the EPA and Illinois EPA Inspections, Pamarco had annual reports that had been submitted for calendar years 2015-2017 that did not include all hazardous wastes shipped offsite for disposal during those calendar years.

##### **8. Recordkeeping Requirements**

Under Ill. Admin. Code tit. 35 § 722.140(c), a generator must keep records of any test results, waste analyses, or other determinations made in accordance with 35 § 722.111(c) for at least three years from the date that the waste was last sent for on-site or off-site treatment, storage, or disposal.

At the time of the EPA and Illinois EPA Inspections, Pamarco did not have documentation of waste determinations for offsite shipments of their chrome oxide waste.

According to Section 3008(a) of RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time

period, or both. Although this letter is not such an order or a request for information under Section 3007 of RCRA, 42 U.S.C. § 6927, we request that you submit a response in writing to us no later than 30 days after receipt of this letter documenting the actions, if any, you have taken since the inspection to establish compliance with the above exemption conditions and requirements described in paragraphs 2 - 8. You should submit your response to: Graciela Scambiatterra, of my staff, at: U.S. EPA, Region 5, 77 West Jackson Boulevard, ECR-17J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Graciela Scambiatterra, at 312-353-5103 or [scambiatterra.graciela@epa.gov](mailto:scambiatterra.graciela@epa.gov).

Sincerely,



Michael D. Harris  
Division Director  
Enforcement and Compliance Assurance Division

Enclosure

cc: Mr. Todd Marvel, Illinois Environmental Protection Agency ([todd.marvel@illinois.gov](mailto:todd.marvel@illinois.gov))





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
LAND AND CHEMICALS DIVISION, RCRA BRANCH  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

COMPLIANCE EVALUATION INSPECTION REPORT

**INSTALLATION NAME:** Pamarco Global Graphics, Inc.

**EPA ID No.:** ILD 005 215 116


**LOCATION ADDRESS:** 125 Flinn Street  
Batavia, Illinois 60510

**NAICS CODE(s):** 333244 [Printing Machinery and Equipment  
Manufacturing]

**DATE OF INSPECTION:** September 10, 2018


**U.S. EPA INSPECTOR(s):** Graciela Scambiatterra

**PREPARED BY:**

  
Graciela Scambiatterra  
Environmental Scientist

10/26/2018  
Date

**APPROVED BY:**

  
Michael Cunningham, Chief  
Compliance Section 1  
RCRA Branch  
Land and Chemicals Division

10/26/18  
Date

## **RCRA Compliance Evaluation Inspection**

### **Introduction**

I, Graciela Scambiaterra, Environmental Scientist, from the United States Environmental Protection Agency (EPA) conducted a hazardous waste compliance evaluation inspection (CEI) at Pamarco Global Graphics Inc. (Pamarco), located at 125 Flinn Street, Batavia, Illinois. The Purpose of the CEI was to evaluate Pamarco's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA), specifically, those regulations related to the management and disposal of hazardous waste. Prior to the CEI, I notified the Illinois Environmental Protection Agency (Illinois EPA) of my intention to inspect Pamarco and invited them to join me, as described in the partnership agreement between Illinois EPA and EPA, Region 5.

Photographs (photos) taken during the inspection are included in Attachment 1.  
Documents obtained during the inspection are annotated in Attachment 2.

### **History and Interview**

I arrived at Pamarco on date at approximately 8:45 a.m., identified myself and provided my credentials to Mr. Richard S. Gilbert, Plant Manager. He escorted me to the office area where I conducted the opening interview. The following individuals were present during the CEI:

<b>NAME</b>	<b>TITLE</b>	<b>EMPLOYER</b>
Gracie Scambiaterra	Environmental Scientist	U.S. EPA
Richard S. Gilbert	Plant Manager (richard.gilbert@pamarco.com)	Pamarco

Once we were in the office area, I held an opening conference with Mr. Gilbert. I explained to him the purpose for being at Pamarco; and that I would be performing a records review and a physical site inspection of Pamarco, including taking photographs. The discussion included confidential business information (CBI). I informed Mr. Gilbert that if he or any other Pamarco employees were going to disclose CBI, I should be informed immediately in order for me to handle that material and/or information in accordance with EPA policy.

Mr. Gilbert provided a brief history of Pamarco. Pamarco has been operating at this location since approximately 1960. They have approximately 26 fulltime employees at this location and operate on a 24 hours/7days per week basis.

Pamarco makes industrial print rolls using mechanical and laser technology that are used primarily by the packaging services industry. The mechanical side includes plating and coating of steel rolls and generates a corrosive plating waste contaminated with hexavalent chrome that is sent offsite as a hazardous waste. The laser side involves a

thermal spray booth that generates a plasma dust/sludge with chrome oxide powder that is sent offsite for reclamation and is not subject to the RCRA management requirements, per 40 CFR 261.2(c)(3).

According to the RCRAInfo database, Pamarco submitted a biennial report, on or about March 1, 2016, for its 2015 calendar year generator activities and notified that it was operating as a large quantity generator of hazardous waste.

I provided the Small Business Resources Guide to Mr. Gilbert.

I provided Mr. Gilbert a list of records I would need to review during the inspection. I explained to him that I would be conducting the physical site inspection portion first, followed by the records review.

### **Physical Site Inspection**

The Pamarco physical site inspection began at approximately 9:32 a.m. in the Warehouse.

#### **Warehouse Area:**

The first area we inspected was the Warehouse Area. Steel rolls, materials and customer parts are kept in this area until they are ready to be processed in the facility, including customer rolls that need repairing and/or resurfacing.

Plasma dust/sludge containers, generated from the laser area/thermal spray booth, are stored in this area until they are sent offsite for reclamation (*see* photos 1-2). There were approximately 100 containers of the plasma dust/sludge in storage.

#### **Laser Processing Area**

Pamarco has two laser machines and a polisher. A laser pattern is applied to the steel rolls and then polished. A small amount of chrome oxide waste is generated here and an Extractor System is used to pipe the waste to the hopper system (*see* photos 3-4). There are four individual hoppers that collect the sludge in 55-gallon containers. These containers, once full, will be taken to the warehouse storage area.

We continued our inspection of Pamarco and walked through the Blasting Room, Prep Area, then the Plasma Room. The Plasma Room is where the majority of the plasma dust/sludge is generated. This area is also connected to the Extractor System.

The final areas we inspected in the Laser Area were the Grinding and Polishing Areas. Here, layers of the rolls are removed as necessary.

### Mechanical Processing Area

The final area we inspected was the Plating Area. Once the rolls undergo prepping and get sized, they are brought to this area for final processing.

The plating line consisted of sodium hydroxide, copper, nickel, and chrome tanks/baths. I was also informed by Mr. Gilbert and the plating operator (Keith Morin) that there were two rinse tanks (see photos 5-6). However, these two rinse tanks did not include a dip rinse of the steel rolls, only accumulation. Mr. Morin explained in detail that while all the other tanks involved the steel rolls being dipped into the plating tanks, the steel rolls are never dipped into the two rinse tanks. Basically, the rolls are suspended directly over the rinse tanks by the crane system and the plating operator uses a spray system on the rolls to rinse them off. The waste drippings drop into the two rinse tanks and the rolls are never submerged into those rinse tanks. The two rinse tanks then function only to accumulate the plating liquid waste residue. The two tanks were labeled with the words "Hazardous Waste" but were not dated.

I concluded the Pamarco physical site inspection at approximately 10:20 a.m., at which time Mr. Gilbert escorted me back to the office area so I could conduct the records review.

### Records Review

I began the record review at approximately 10:30 a.m. Mr. Gilbert provided the records for my review.

### Training

I asked Mr. Gilbert for copies of Pamarco's RCRA training records for my review. Mr. Gilbert informed me that he had inherited the environmental program the previous year and is not aware of any RCRA training conducted at Pamarco since 2011. Mr. Gilbert also informed me that he began employment at Pamarco during the Spring of 2017. I was not provided with any training records to review.

### Contingency Plan

I reviewed the plan titled "Hazardous Substances Contingency Plan for Pamarco Inc.," dated March 14, 1994. I noted the following:

- Joseph P. Trungale, Primary Emergency Coordinator. Mr. Trungale has not been employed by Pamarco for at least a year, according to Mr. Gilbert.
- Robert Steffey, First Alternate Emergency Coordinator. Mr. Steffey has been retired for several years, according to Mr. Gilbert.
- Rondi Jurgens, Second Alternate Emergency Coordinator. Mr. Jurgens has not been employed by Pamarco for at least a year, according to Mr. Gilbert.
- Emergency response equipment is listed in the plan.

- Arrangements made with the local emergency departments were listed in the plan, including documentation that the plan was provided to each emergency department.
- Evacuation plan and routes were listed in the plan.
- The plan described actions required for response to fire, explosion or spills.

#### Hazardous Waste Determinations

I reviewed these waste determinations and noted following:

1. D007 Tank Rinses (Tanks 5-3 and 5-6): analytical report from Envirite Corporation, dated 1/18/1996. Hazardous waste: TCLP Chromium = 38ppm; D007 hazardous waste code.
2. Acid Copper Waste: no date. Hazardous waste: D002 hazardous waste code.
3. Grinding waste: dated 11/16/1994, non-hazardous waste.
4. Plasma sludge/chrome oxide waste: was not available for my review.

#### Annual Reports

Hazardous Waste Annual Report								
Calendar Year:		2017		Date Signed:		2/28/2018		
Certified Mail Receipt:								
Waste Streams Reported								
D007	D002							

The Hazardous Waste Annual Reports for calendar years 2015 and 2016 were not available for my review.

#### Manifests/LDRs

I asked to review the hazardous waste manifests beginning January 2015 until the present. The most recent offsite shipments for each waste stream are documented below:

Hazardous Waste Manifests				
Manifest Number	Waste Code(s)	Quantity	Date	Facility Signatory/TSDF
018420982 JJK	D007/D002/D001	330 G	5/31/2018	Paul Frieders/SET
	D007	2400 P		
	D007/D002/D001	35 G		
018420978 JJK	D007/D002	2000 G	5/31/2018	Keith Morin/Envirite
017188671 JJK	D007/D002	1700 G	5/5/2018	Keith Morin/Envirite
018457965 JJK	D007/D002	1756 G	2/22/2018	Keith Morin/Envirite
018457117 JJK	D007/D002	1900 G	1/2/2018	Keith Morin/Envirite
017975435 JJK	D007/D002/D001	95 G	11/20/2017	Paul Frieders/SET
	D007/D002	40 G		
	D007	2750 P		

Mr. Gilbert provided copies of the remaining manifests he was storing at the facility (*see* annotation of the manifest records in Attachment 2 [Document #1]). He also informed me that he would contact Pamarco's waste contractors to get any additional missing hazardous waste manifests.

Treatment, Storage, and Disposal Facilities (TSDFs) where Pamarco hazardous waste is sent:

1. SET Environmental, Inc (TXD 055 135 388)
2. Envirite of Illinois (ILD 000 666 206)

### Inspection Reports

Mr. Gilbert informed me that he was not aware that there was a requirement for weekly inspections of containers at hazardous waste storage areas, therefore, he had not been conducting them.

### Hazardous Waste Storage Tanks

I asked to review the written tank certifications for the two rinse tanks in the plating area and the daily tank inspections. Mr. Gilbert informed me that he was not aware of the requirement for the certification or the daily inspections and he didn't have anything for me to review during the CEI.

I concluded the Pamarco records review at approximately 11:45 a.m., at which time I prepared to conduct a closing conference.

### Closing Conference

I sat down with Mr. Gilbert to discuss the records review and the physical site inspection. The following topics were discussed:

1. Training: documentation of hazardous waste training was not presented for my review. Mr. Gilbert informed me that he was not aware of any recent training and that he had started employment at Pamarco during the Spring of 2017.
2. Weekly Inspections: were not being accomplished.
3. Annual Reports: I was not able to review the hazardous waste annual reports for calendar years 2015 and 2016. Mr. Gilbert informed me that he would provide them at a later date.
4. Waste Determination: I informed Mr. Gilbert that I needed to review the chrome oxide waste determination. Mr. Gilbert informed me he would provide it as soon as possible.
5. Contingency Plan: Emergency Coordinators listed in the plan are no longer employed at Pamarco. Mr. Gilbert informed me that he would provide an update at a later date.

6. Rinse tanks in Plating Area: the two tanks are labeled "Hazardous Waste." The two tanks are not "dip tanks" and are only accumulating hazardous waste, therefore do not appear to be process tanks for the plating line. I informed Mr. Gilbert of the requirements for hazardous waste storage tanks (Subpart J of RCRA), including the need for a professional engineer to certify written tank certifications as well as the daily inspections of tanks, at minimum.

I thanked Mr. Gilbert for his time and the documents he provided me. I explained that a thorough review would be completed and a compliance determination would be forthcoming.

I completed the CEI at approximately 12:15 p.m. and departed Pamarco.

**ATTACHMENTS: (3)**

Attachment 1	Photographs taken during the inspection
Attachment 2	List of documents obtained during the CEI
Attachment 3	Inspection checklist

**ADDENDUM:**

On September 10, 11 and 20, 2018, I received email correspondence with written documentation addressing items number 3-5 discussed during the Closing Conference.

Attachment 1  
Pamarco-RCRA CEI  
EPA ID Number: ILD 005 215 116  
September 10, 2018



Photo 1. Photographer: G. Scambiaterra. Time: 9:39 a.m.  
Description: Plasma dust/sludge containers



Attachment 1  
Pamarco-RCRA CEI  
EPA ID Number: ILD 005 215 116  
September 10, 2018



Photo 2. Photographer: G. Scambiatterra. Time: 9:40 a.m.  
Description: Plasma dust/sludge containers

Attachment 1  
Pamarco-RCRA CEI  
EPA ID Number: ILD 005 215 116  
September 10, 2018



Photo 3. Photographer: G. Scambiaterra. Time: 9:49 a.m.  
Description: Extractor System Hopper; Plasma dust/sludge from Laser Area



Attachment 1  
Pamarco-RCRA CEI  
EPA ID Number: ILD 005 215 116  
September 10, 2018



Photo 4. Photographer: G. Scambiatterra. Time: 9:50 a.m.  
Description: Extractor System Hopper; Plasma dust/sludge from Laser Area

Attachment 1  
Pamarco-RCRA CEI  
EPA ID Number: ILD 005 215 116  
September 10, 2018

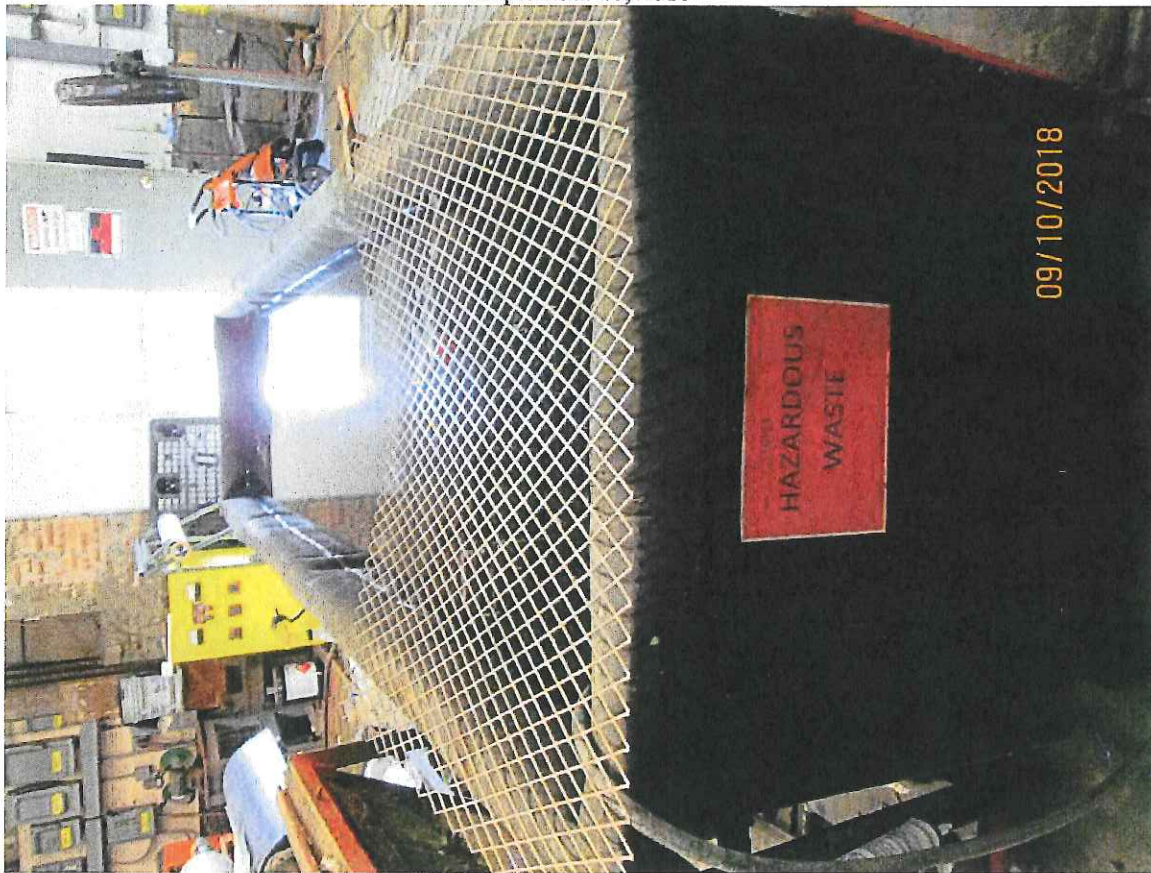


Photo 5. Photographer: G. Scambiaterra. Time: 10:01 a.m.  
Description: Plating Area; rinse tank



Attachment 1  
Pamarco-RCRA CEI  
EPA ID Number: ILD 005 215 116  
September 10, 2018



Photo 6. Photographer: G. Scambiaterra. Time: 10:03 a.m.  
Description: Plating Area; rinse tank

Attachment 2  
Pamarco-RCRA CEI  
EPA ID Number: ILD 005 215 116  
September 10, 2018

Table of Documents: Documents received during the inspection:

Document #	Description	Claimed as CBI
1	Manifests/LDRs for calendar years 2015-2018 (18 pages)	No

Installation Name:  
Pamarco Global Graphics, Inc.  
Date of Inspection:  
September 10, 2018

Location Address:  
125 Flinn Street, Batavia, IL 60510  
U.S. EPA Inspector:  
G. Scambiaterra

EPA ID Number:  
ILD 005 215 116

### Attachment 3

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<b>PART 722: STANDARDS APPLICABLE TO GENERATORS OF HAZARDOUS WASTE (&gt;1000 KG/MO.)</b>	
	<b>SUBPART A: GENERAL</b>	
722.111	<b>Section 722.111 Hazardous Waste Determination</b> Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? Yes _____ No _____ N/A _____ <i>Under review</i>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes _____ No _____ N/A _____	
808.121(a)	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes _____ No _____ N/A _____	
722.112(a)	<b>Section 722.112 USEPA Identification Numbers</b> Has the generator obtained a USEPA identification number? Yes <input checked="" type="checkbox"/> No _____ N/A _____	808.121(a) 722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.112(c)
	<b>SUBPART B: THE MANIFEST</b>	
722.120(a)	<b>Section 722.120 General Requirements</b> Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No _____ N/A _____	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.120(a)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.120(b)
722.121(a)	<b>Section 722.121 Acquisition of Manifests</b> Has the generator used: - an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.120(d) 722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.121(b)
722.122	<b>Section 722.122 Number of Copies</b> Does the manifest consist of at least 6 copies? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.122
722.123(a)	<b>Section 722.123 Use of the Manifest</b> For each manifest reviewed, has the generator: - signed the certificate by hand? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No _____ N/A _____ - apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.123(a)
722.123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.123(b)

**Installation Name:**  
Pamarco Global Graphics, Inc.  
**Date of Inspection:**  
September 10, 2018

**Location Address:**  
125 Flinn Street, Batavia, IL 60510  
**U.S. EPA Inspector:**  
G. Scambiaterra

**EPA ID Number:**  
ILD 005 215 116

### Attachment 3

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.123(c)	<p>has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	722.123(c)
722.130	<p><b>SUBPART C: PRE-TRANSPORT REQUIREMENTS</b></p> <p>Is there any hazardous waste ready for transport off-site?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>If so, is the generator complying with the pre-transport requirements in Subpart C?</p> <p>Yes _____ No _____ N/A _____</p>	722.130 Under review
(722.134(a))	<p><b>Section 722.134 Accumulation Time</b></p> <p>Has the generator complied with the following requirements:</p> <p>Yes _____ No _____ N/A _____</p>	Under review
(722.134(a)(1))	<p>A) For waste in containers, has the generator complied with the requirements of Part 725, Subpart I, AA, BB, and CC?</p> <p>Yes _____ No _____ N/A _____</p> <p>and/or</p> <p>B) For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J, AA, BB, and CC (except Sections 725.297(c) and 725.300)?</p> <p>Yes _____ No _____ N/A _____</p> <p>and/or</p> <p>C) For waste on drip pads, has the generator complied with the requirements of Part 725, Subpart W and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A _____</p> <p>and/or</p> <p>D) For waste in containment buildings, has the generator complied with Part 725, Subpart DD and maintained the required records identified in this subsection?</p> <p>Yes _____ No _____ N/A _____</p>	Under review
(722.134(a)(2))	<p>For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(722.134(a)(3))	<p>For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(722.134(a)(4))	<p>Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)?</p> <p>Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:</p> <p>Does the facility accumulate hazardous waste in containers?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No", go to Subpart J.</p>	
(725.211) (725.214)	<p><b>SUBPART I: USE AND MANAGEMENT OF CONTAINERS</b></p> <p>Has the generator closed an accumulation area?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	725.211 725.214



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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.271)	If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.272)	Is the waste compatible with the container and/or liner? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.273(a))	Are containers of hazardous waste always closed except to remove or add waste during accumulation? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.273(b))	Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.274)	Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration? Yes _____ No <input checked="" type="checkbox"/> N/A _____ Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131) Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
(725.276)	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line? Yes _____ No _____ N/A <input checked="" type="checkbox"/> <b>Note:</b> See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.	
(725.277)	Is the owner/operator complying with the requirements concerning incompatible wastes? Yes _____ No _____ N/A _____ COMMENTS:	
(725.278)	<b>Section 725.278 Air Emission Standards</b> Is the owner or operator managing all hazardous waste placed in containers in accordance with Subparts AA, BB and CC of Part 725? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Comments: Does the generator accumulate and/or treat hazardous waste in tanks? Yes _____ No _____ N/A <input checked="" type="checkbox"/> <b>Note:</b> If "No", go to Subpart C.	
	<b>SUBPART J: TANK SYSTEMS</b>	
(725.211)	Has the generator closed an accumulation area? Yes _____ No <input checked="" type="checkbox"/> N/A _____	725.211
(725.214)	If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214? Yes _____ No _____ N/A _____	725.214

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(725.290)	<p>Does the facility accumulate or treat hazardous waste in tanks?  Yes <u>✓</u> No _____ N/A _____</p> <p><b>Note:</b> A generator may treat hazardous waste in a tank for less than 90 days without a RCRA permit.  If "No", skip Subpart J.</p> <p>a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.  b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).  c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.</p>	
(725.291(a))	<p>For tanks <b>existing</b> prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]?  Yes _____ No _____ N/A _____</p>	
(725.291(b))	<p>Does this assessment consider at least the following:</p> <p>1) design standards for the tank and ancillary equipment?  Yes _____ No _____ N/A _____</p> <p>2) hazardous characteristics of the wastes?  Yes _____ No _____ N/A _____</p> <p>3) existing corrosion protection measures?  Yes _____ No _____ N/A _____</p> <p>4) documented age of the tank system?  Yes _____ No _____ N/A _____</p> <p>5) results of a leak test, internal inspection, or other tank integrity examination?  Yes _____ No _____ N/A _____</p> <p>*IRPE = Independent Registered Professional Engineer</p>	Under review
(725.291(c))	<p>Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste?  Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).</p>	Under review

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.292(a))	<p>For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 07/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system?</p> <p>Yes _____ No _____ N/A _____</p> <p>Does the assessment include, at a minimum, the following:</p> <p>1) design standards for tanks and ancillary equipment? Yes _____ No _____ N/A _____</p> <p>2) hazardous characteristics of the waste(s) to be handled? Yes _____ No _____ N/A _____</p> <p>3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water? Yes _____ No _____ N/A _____</p> <p>4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____</p> <p>5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgment and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____</p>	Under review
(725.292(g))	<p>Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293(a))	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A _____</p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A _____</p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p>	Under review
(725.293(b))	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A _____</p>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(c))	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <p>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____</p> <p>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression of uplift? Yes _____ No _____ N/A _____</p> <p>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____</p> <p>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____</p> <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p> <p><b>Note:</b> A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>	<p><i>under review</i></p> <p>↓</p>
(725.293(d))	<p>Does the secondary containment for tanks have one or more of the following:</p> <p>1) a liner (external to the tank); or 2) a vault; or 3) a double-walled tank; or 4) an equivalent device (approved by the Board)? Yes _____ No _____ N/A _____</p>	
(725.293(e))	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)? Yes _____ No _____ N/A _____</p>	
(725.293(f))	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c)? Yes _____ No _____ N/A _____</p> <p>If "No":</p> <p>1) Is aboveground piping (exclusive of flanges, joints, valves and connections) inspected daily? Yes _____ No _____ N/A _____</p> <p>2) Are welded flanges, joints and connections inspected daily? Yes _____ No _____ N/A _____</p> <p>3) Are sealless or magnetic coupling pumps and sealless valves inspected daily? Yes _____ No _____ N/A _____</p> <p>4) Are pressurized aboveground piping systems with automatic shut-off devices inspected daily? Yes _____ No _____ N/A _____</p>	<p><i>under review</i></p>

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293(i))	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted? Yes _____ No _____ N/A _____</p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted? Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)? Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296.</p>	Under review
(725.294(a))	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail? Yes _____ No _____ N/A _____</p>	↓
(725.294(b))	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls? Yes _____ No _____ N/A _____</p> <p>2) overfill prevention controls? Yes _____ No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks? Yes _____ No _____ N/A _____</p>	↑
(725.294(c))	<p><b>Note:</b> If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	
(725.295(a))	<p>Does the owner/operator inspect, if present, at least each operating day, the following:</p> <p>1) overfill/spill control equipment? Yes _____ No _____ N/A _____</p> <p>2) the aboveground portion of the tank system for corrosion or releases? Yes _____ No _____ N/A _____</p> <p>3) data from monitoring equipment? Yes _____ No _____ N/A _____</p> <p>4) the construction materials and the area immediately surrounding the external portion of the system? Yes _____ No _____ N/A _____</p>	Under review
(725.295(b))	<p>If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? Yes _____ No _____ N/A _____</p>	↓
(725.295(c))	<p>Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? Yes _____ No _____ N/A _____</p>	

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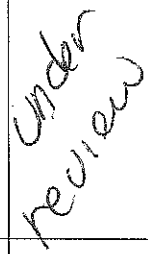
Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.296)	<p>If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator:</p> <p>a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? Yes _____ No _____ N/A _____</p> <p>b) removed applicable waste from the system within 24 hours of detection? Yes _____ No _____ N/A _____</p> <p>c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? Yes _____ No _____ N/A _____</p>	
(725.296(d))	<p>d) notified the Agency within 24 hours of detection of release? Yes _____ No _____ N/A _____</p> <p>d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.</p>	↑
(725.296(e))	<p>e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? Yes _____ No _____ N/A _____</p> <p>e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? Yes _____ No _____ N/A _____</p> <p>e)4) met the requirements for a new tank system in the event that a component is replaced during repair? Yes _____ No _____ N/A _____</p> <p>e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? Yes _____ No _____ N/A _____</p>	under review
(725.296(f))	<p>f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? Yes _____ No _____ N/A _____</p> <p><b>Note:</b> If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	↓
(725.297(a))	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]? Yes _____ No _____ N/A _____</p>	
(725.297(a))	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H? Yes _____ No _____ N/A _____</p>	

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(725.297(b))	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?</p> <p>Yes _____ No _____ N/A _____</p> <p><b>Note:</b> Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	  
(725.298(a))	<p>Are ignitable or reactive wastes placed in a tank system?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> <li>- the resulting waste, mixture or dissolved material is no longer ignitable or reactive?</li> </ul> <p>Yes _____ No _____ N/A _____</p> <ul style="list-style-type: none"> <li>- Section 725.117(b) is complied with?</li> </ul> <p>Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction?</p> <p>Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.298(b))	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank?</p> <p>Yes _____ No _____ N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with?</p> <p>Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with?</p> <p>Yes _____ No _____ N/A _____</p> <p>COMMENTS:</p>	
(725.302)	<p><b>Section 725.302 Air Emission Standards</b></p> <p>Is the owner or operator managing all hazardous waste placed in tanks in accordance with Subparts AA, BB and CC of Part 725?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>Comments:</p>	
(725.131)	<p><b>SUBPART C: PREPAREDNESS AND PREVENTION</b></p> <p>Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment?</p> <p>Yes _____ No _____ N/A _____</p>	

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(725.132)	<p>Is the facility equipped with the following, if necessary:</p> <p>a) an internal communication or alarm system(s)? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>d) water at adequate volume and pressure for fire control? Yes _____ No _____ N/A _____</p>	
(725.133)	<p>Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.134)	<p>a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.135)	<p>Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.137)	<p>Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste:</p> <ul style="list-style-type: none"> <li>- arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input checked="" type="checkbox"/> No _____ N/A _____</li> <li>- agreements designating the primary authority where more than one police or fire department might respond? Yes <input checked="" type="checkbox"/> No _____ N/A _____</li> <li>- agreements with State emergency response teams, contractors and equipment suppliers? Yes <input checked="" type="checkbox"/> No _____ N/A _____</li> <li>- arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input checked="" type="checkbox"/> No _____ N/A _____</li> </ul>	
	<b>SUBPART D: CONTINGENCY PLAN AND EMERGENCY PROCEDURES</b>	
(725.151(a))	<p>Is the contingency plan available? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>If "No", skip to Section 725.155.</p> <p>Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input checked="" type="checkbox"/> No _____ N/A _____</p>	
(725.151(b))	<p>Has there been a fire, explosion or release of hazardous waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>If "Yes", has the contingency plan been carried out immediately? Yes _____ No _____ N/A _____</p>	



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(725.152(a))	Does the plan describe the actions required for response to: - fires? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - explosions? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - releases? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.152(c))	Does the plan describe arrangements with: - police and fire departments? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospitals? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - contractors? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.152(d))	Does the plan contain the current emergency coordinator's name, phone (office and home) and address? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	Corrected after the CEI
(725.152(e))	Does the plan identify all emergency equipment including: - description? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - capability? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - location? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the list of emergency equipment up-to-date? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.152(f))	Does the plan include: - an evacuation plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - an evacuation signal? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - alternate evacuation routes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.153)	Has the contingency plan (including all revisions) been: a) maintained at the facility? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) submitted to: - police department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - fire department? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - hospital? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - emergency response teams? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.154)	Has the contingency plan been reviewed and revised whenever: a) regulations are revised? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) the plan fails in an emergency? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) the facility changes in a way that modifies the emergency response necessary? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) information regarding emergency coordinators changes? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> e) information regarding equipment changes? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.155)	Is the emergency coordinator on-site or on call at all times? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> <b>Note:</b> If the facility has had a release, explain in detail.	

**Installation Name:**  
Pamarco Global Graphics, Inc.  
**Date of Inspection:**  
September 10, 2018

**Location Address:**  
125 Flinn Street, Batavia, IL 60510  
**U.S. EPA Inspector:**  
G. Scambiaterra

**EPA ID Number:**  
ILD 005 215 116

### Attachment 3

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.116(a))	<p><b>Section 725.116 Personnel Training</b> Does the facility have a training program? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> <li>- procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- key parameters for automatic waste feed cut-off systems? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- communications or alarm systems? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- response to fire or explosions? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- response to groundwater contamination incidents? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>- shutdown of operations? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> </ul>	
(725.116(b))	<p>Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	
(725.116(c))	<p>Have facility personnel received an annual review of the initial training? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	
(725.116(d))	<p>Are the following documents and records being maintained at the facility:</p> <ol style="list-style-type: none"> <li>1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> <li>4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes _____ No <input checked="" type="checkbox"/> N/A _____</li> </ol>	
(725.116(e))	<p>Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes _____ No <input checked="" type="checkbox"/> N/A _____</p>	

Installation Name:  
Pamarco Global Graphics, Inc.  
Date of Inspection:  
September 10, 2018

Location Address:  
125 Flinn Street, Batavia, IL 60510  
U.S. EPA Inspector:  
G. Scambiaterra

EPA ID Number:  
ILD 005 215 116

### Attachment 3

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(728.107(a)(5))	<b>Section 728.107 Waste Analysis and Recordkeeping</b> Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Is the plan on-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Does the plan include a detailed physical and chemical analysis? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(c)	<b>Section 722.134 Satellite Accumulation</b> Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste, limiting such accumulation to 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste, complying with Sections 725.271, 725.272 and 725.273(a), and marking the containers with the words "Hazardous Waste" or other words identifying the contents? Yes _____ No _____ N/A <input checked="" type="checkbox"/> Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste complied with the requirements of Section 722.134(a) within 3 working days? Yes _____ No _____ N/A <input checked="" type="checkbox"/> If there are more than 55 gallons of hazardous waste or 1 quart of <b>acutely</b> hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began? Yes _____ No _____ N/A <input checked="" type="checkbox"/> During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	
722.134(g)	<b>Note:</b> A generator that generates 1,000 kilograms or greater of hazardous waste per calendar month which also generates wastewater treatment sludges from electroplating operations that meet the listing description for the hazardous waste code F006 may have alternate accumulation requirements if the conditions of 722.134(g), (h), or (i) are fulfilled.	
	<b>SUBPART D: RECORDKEEPING AND REPORTING</b>	
722.140(a)	<b>Section 722.140 Recordkeeping</b> Has the generator retained for a period of 3 years: - a copy of each signed manifest? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(a)
722.140(b)	Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(b)
722.140(c)	Has the generator retained for a period of 3 years: - copies of test results, waste analyses or other determinations made in accordance with Section 722.111? Yes <input checked="" type="checkbox"/> No _____ N/A _____	722.140(c)
722.140(d)	Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)? Yes _____ No _____ N/A <input checked="" type="checkbox"/>	722.140(d)

**Installation Name:**  
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**Location Address:**  
125 Flinn Street, Batavia, IL 60510  
**U.S. EPA Inspector:**  
G. Scambiatterra

**EPA ID Number:**  
ILD 005 215 116

### Attachment 3

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(a)	<b>Section 722.141 Annual Reporting</b> Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> <b>Note:</b> If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.	722.141(a)
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.141(b)
722.142(a)(1)	<b>Section 722.142 Exception Reporting</b> If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.142(a)(2)
722.143	<b>Section 722.143 Additional Reporting</b> Has the generator furnished additional reports as required by the Director? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.143
722.150	<b>SUBPART E: EXPORTS OF HAZARDOUS WASTE</b> Is the generator an exporter of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart E? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.150
722.160	<b>SUBPART F: IMPORTS OF HAZARDOUS WASTE</b> Is the generator an importer of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart F? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.160
722.170	<b>SUBPART G: FARMERS</b> Is the generator a farmer? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the generator complied with the requirements of Subpart G? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.170

# Bureau of Land – Field Operations Section

## RCRA Evaluation Report

General Facility Information			
<b>BOL ID:</b>	0890100008	<b>Region:</b>	Des Plaines
<b>USEPA ID:</b>	ILD005215116	<b>County:</b>	Kane
<b>Site Name:</b>	Pamarco Global Graphics	<b>Phone:</b>	630-879-7300
<b>Address:</b>	125 Flinn St	<b>Latitude:</b>	41.84755
<b>City/State/Zip:</b>	Batavia, IL 60510	<b>Longitude:</b>	-88.30988
<b>Inspection Date:</b>	2/13/2019		

Observations	
Time	1010 - 1230
Weather Conditions (Description)	Snow
Temperature (°F)	27
Photos Taken (Yes/No)	Y

Facility Type		
Most Recent Notification Date	Notified As	Regulated As
3/1/2018	LQG	LQG

Evaluation Type
Compliance Evaluation Inspection

Inspection Participants		
Participant	Agency/Bureau	Phone
James Haennicke	Des Plaines IEPA Field Operations Inspector	847/294-4000
Tina Kovasznay	Des Plaines IEPA Field Operations Inspector	847/294-4000

Persons Interviewed		
Person	Phone	Email
Richard Gilbert, Plant Manager	(908) 265-0425	Not Listed

Owner	Operator
Pamarco Global Graphics Nick Blondell 125 Flinn St Batavia, IL 60510	Pamarco Global Graphics Nick Blondell 125 Flinn St Batavia, IL 60510

Part B Permit					
Application Date	Expiration Date	Log #	Current Mod #	Issue Date	Mod Issue Date

Active Enforcement Orders					
CACO	Consent Decree	CAFO	IPCB	Federal Court	State Court

TSD Activity Summary				
Activity Process	On Part B	Ever Done	Closed	Done During Inspection
S01 - Container	No	Yes	No	Yes

S02 - Tank	No	Yes	No	Yes
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## Executive Summary

On February 13, 2019, I conducted a RCRA Compliance Evaluation Inspection (CEI) at Pamarco Global Graphics (Pamarco) in Batavia. Pamarco manufactures engraved print cylinders (rollers and sleeves) for the flexographic printing industry. I conducted the inspection as part of Illinois EPA's RCRA workplan. I interviewed Richard Gilbert, Plant Manager. Several violations were observed during this inspection.

## Evaluation Narrative

Pamarco produces engraved textured industrial print rollers. The rollers are used by printers for distributing ink in printing presses, and by manufacturers of corrugated cardboard, to distribute glue when bonding the layers. The rollers are textured, or dimpled, to hold ink or glue. The texture is sometimes applied directly to the steel or fiberglass rollers, but it is more typical for the texture to be applied to a sleeve that fits over the roller. The sleeve may be made of steel, copper, ceramic or aluminum.

Two techniques are used to make dimples on the surface of the roller or sleeve. In the traditional mechanical method, the roller or sleeve is placed in a lathe where a mill, which has a pattern of sharp points, is used to apply the dimples. The more modern technique uses a laser to create a pattern of dimples. The pattern of dimples is typically very small and cannot easily be seen with the naked eye. The size and pattern of the texturing is specific to the roller's end use.

The mechanical side produces all the hazardous waste generated by Pamarco. Waste is generated from the chrome plating department. The only waste generated from the laser section is a plasma dust/sludge with chrome oxide powder that is sent off-site for reclamation and is not subject to the RCRA management requirements per 40 CFR 721.102(c)(3) according to Mr. Gilbert. No evidence was provided to show that this waste is being sent off-site for reclamation.

During the inspection, I was informed that the USEPA (Graciela Scambiaterra) had conducted an inspection on September 10, 2018.

The following documents were requested for review during the inspection: manifests for the last 3 years, annual reports for the last 3 years, contingency plan, personnel training records, and written tank assessments. Upon review of the documents provided to me, the following observations were made:

- 1) Three years of manifests were not available for review during the inspection. Following the inspection, Mr. Gilbert emailed copies of manifests, but it is still unclear whether all Pamarco's manifests were made available.
- 2) Annual reports were available at the time of the inspection, but not all wastes were included on the reports.
- 3) The contingency plan had been updated since Ms. Scambiaterra's inspection and appeared to satisfy the conditions set forth in the regulations.
- 4) It appears that Pamarco has not conducted any personnel training since 2011.
- 5) Tank assessments were not available.

Following the document review, a site tour was conducted. The first area we inspected was the warehouse area. Plasma dust/sludge containers, generated from the laser area are stored in this area prior to shipment off-site for reclamation. There were approximately 50 drums of the plasma dust on-

site at the time of the inspection. There were also 6 drums of the chrome solid waste on site. All these drums were labeled with the words hazardous waste and indication of the hazards of the contents. One drum was not dated. Mr. Gilbert stated that this drum had just been moved to this storage area; therefore, he put the prior days date on the container. The other drums had the following dates: October 24, 2018, October 17, 2018, October 4, 2018, June 23, 2018, and August 8, 2015. The drum dated August 8, 2015 had the date written on the top of the drum and also on the label. Someone had written over the 2015 date and changed it to 2018. Aisle space was not adequate to easily inspect these drums. This area had the approximate dimensions of 4' wide by 12' deep/long. Pamarco is currently storing hazardous waste on-site for greater than 90 days without a permit; therefore, RCRA closure will be required for this storage area.

Next, we entered the laser processing area. As previously stated, only the plasma dust is generated in this area.

The final area we inspected was the plating area. According to Mr. Gilbert, since Ms. Scambiaterra's inspection, the copper plating process has been shut down. He also stated that Pamarco plans on shutting down the chrome plating line in April. In this area, I observed two rinse tanks. These tanks are hazardous waste accumulation/storage tanks because rollers are suspended directly over the tanks and rinsed, allowing the waste drippings to drop into the tanks. One of the tanks had a plastic tank inside the metal tank to address the lack of secondary containment found by Ms. Scambiaterra. From information obtained from Mr. Gilbert, it appears that this tank holds the acidic inorganic (sulfuric)/copper sulfate waste that is shipped off-site on a routine basis, although there is no log showing that waste is removed from the tank every 90 days. The other tank did not have the plastic tank inside it; therefore, it had no secondary containment. The hazardous rinse water (sodium hydroxide) from this tank has not been shipped off-site since May 31, 2018, and there were no logs to show that waste was removed within 90 days of generation; therefore, this tank must be considered a hazardous waste storage tank. Because the employee that ran the plating department was fired, the information provided was not clear. Mr. Gilbert stated that he was not sure of how the plating department was run and what tanks held what waste. There was one satellite accumulation area for chrome solids located in the plating area. Wastes generated in this area are summarized in the waste disposition form attached to this report.

The following apparent violations were observed:

703.121(a) - No person may conduct any hazardous waste storage, hazardous waste treatment, or hazardous waste disposal operation without a RCRA permit for the hazardous waste management facility.

(722.117(a)) - Hazardous waste in tanks and containers was stored on site for greater than 90 days.

(722.117(a)(2)) - Accumulation of hazardous waste in tanks.

(725.291) - Assessment of existing tank system integrity was not available.

(725.292) - Assessment of new tank system was not available.

(725.293) - One of the hazardous waste storage tanks did not have adequate secondary containment.

(722.117(a)(5)(A)(iii)) - One drum of chrome solid was not labeled at the time of the inspection. This was corrected during the inspection.

(722.117(a)(5)(B)(ii)) - The hazardous waste storage tanks were not labeled with an indication of the hazard of the contents.

(722.117(a)(5)(B)(iii)) - There were no logs or other records to demonstrate that the hazardous waste had been emptied within 90 days of the first entering the tank.



(722.117(a)(5)(B)(iv) - No logs or records are kept with the information to prove waste is removed from tanks within 90 days.

(722.117(a)(7)(A)(i) - Facility personnel must successfully complete a program of classroom instruction, online training or on-the-job training that teaches them to perform their duties in a way that ensures compliance with this Part

722.141(a) - A LQG must submit an annual report to the Agency by March 1 of the following year. The annual report must cover generator activities during the previous calendar year. (Although annual reports were submitted, not all wastes were included on those annual reports).

722.111 - No waste determination has been made on the chrome oxide.

725.135 - The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment to any area of the facility operation in an emergency.

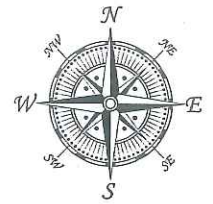
725.212(a) - The owner or operator of a hazardous waste management facility must have a written closure plan.

Summary of Apparent Violation(s)			
Status	Date Cited	Violation	Narrative
New	2/13/2019	703.121(a)	Hazardous waste storage, treatment, or disposal operation conducted without or in violation of RCRA permit
New	2/13/2019	722.111	Hazardous waste determination
New	2/13/2019	722.141(a)	Annual report to IEPA 1 March if site was LQG at least once during year and waste shipped off-site
New	2/13/2019	725.135	Aisle space requirements
New	2/13/2019	725.212(a)	Closure plan written within 6 months after facility becomes subject to § 725.212; copy furnished to Agency upon request until final closure certified; for facilities without approved plans, provided during inspections to Agency representatives

Attachment Listing		
ID	Type	Description
No Attachments		

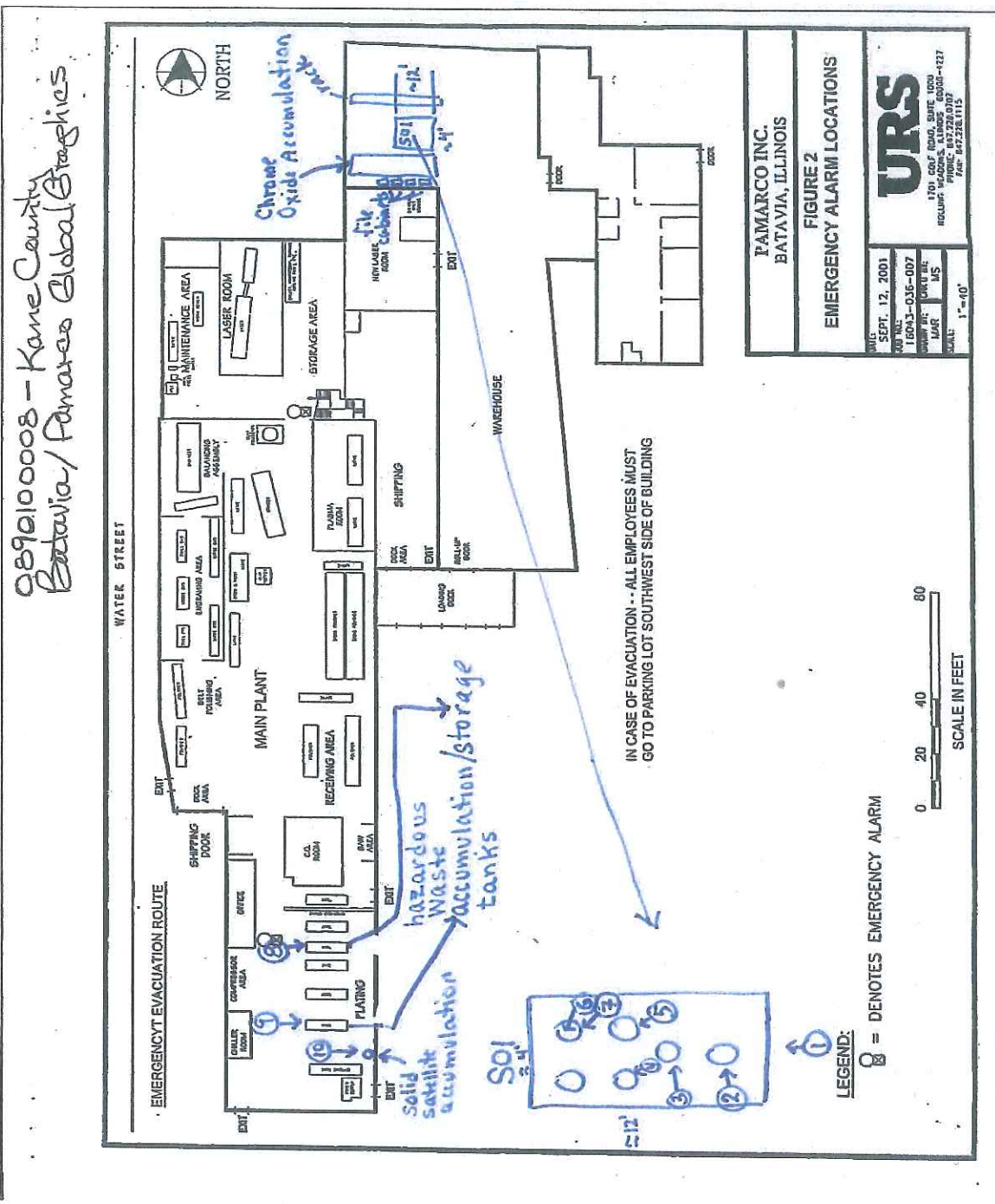


# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY



## Site Diagram(s)

Site Diagram 1: February 13, 2019 • Pamarco Global Graphics (0890100008) • Kane County





Site: Pamarco Global Graphics  
(0890100008)  
Kane County

Photo ID: 1  
Photo Date: 2/13/2019  
Photo Time: 11:04:57  
Direction: West  
Taken By: Tina Kovaszny

Hazardous waste storage area.

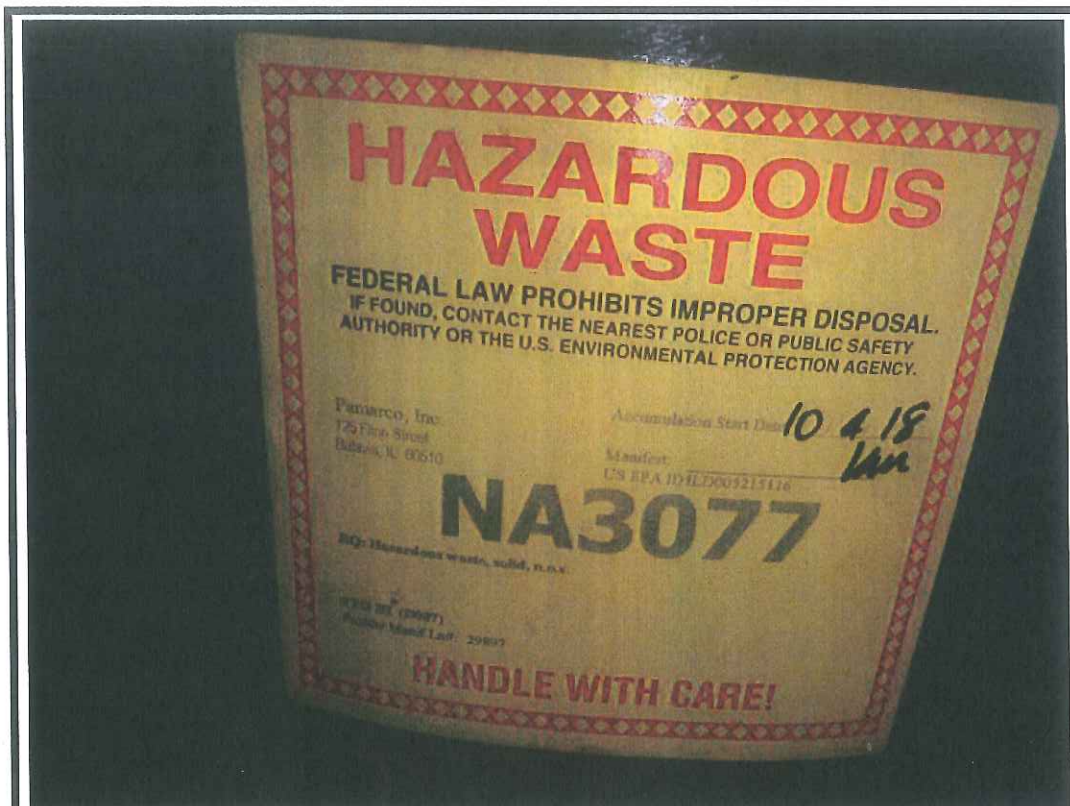


Site: Pamarco Global Graphics  
(0890100008)  
Kane County

Photo ID: 2  
Photo Date: 2/13/2019  
Photo Time: 11:05:19  
Direction: North  
Taken By: Tina Kovaszny

Hazardous waste drum had no date - corrected at the time of the inspection.

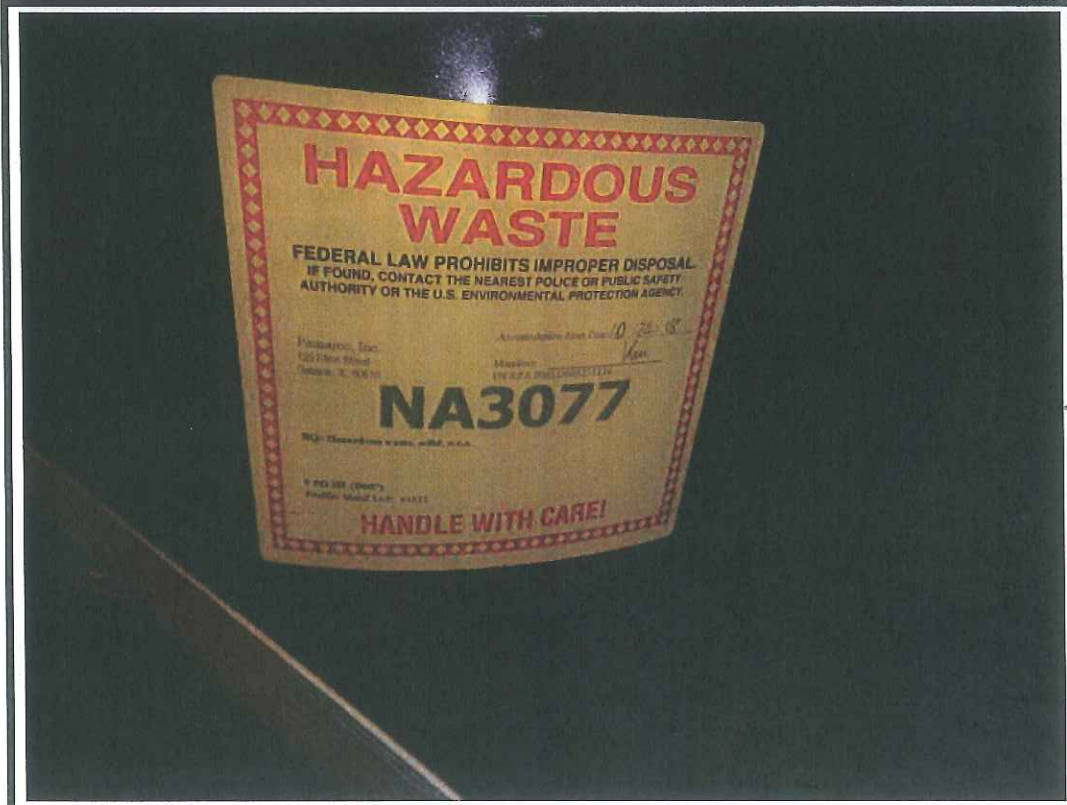




Site: Pamarco Global Graphics  
(0890100008)  
Kane County

Photo ID: 3  
Photo Date: 2/13/2019  
Photo Time: 11:05:27  
Direction: North  
Taken By: Tina Kovasznay

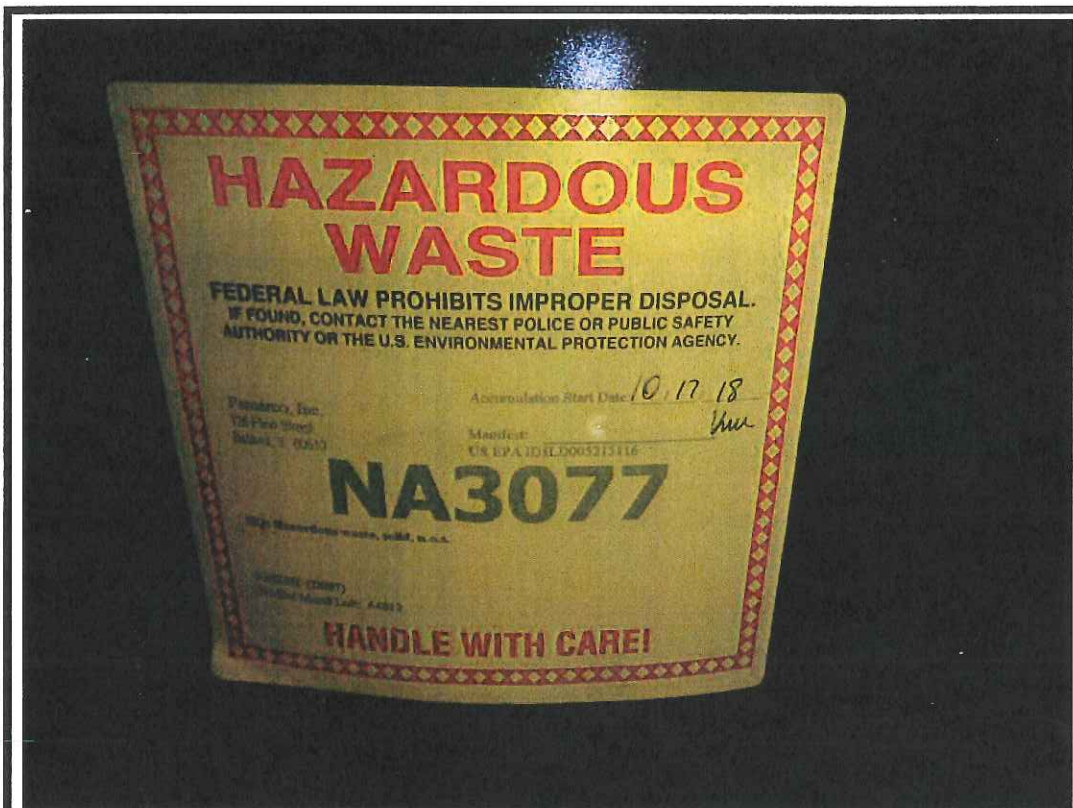
Hazardous waste drum stored  
on-site for greater than 90  
days.



Site: Pamarco Global Graphics  
(0890100008)  
Kane County

Photo ID: 4  
Photo Date: 2/13/2019  
Photo Time: 11:05:37  
Direction: Southwest  
Taken By: Tina Kovasznay

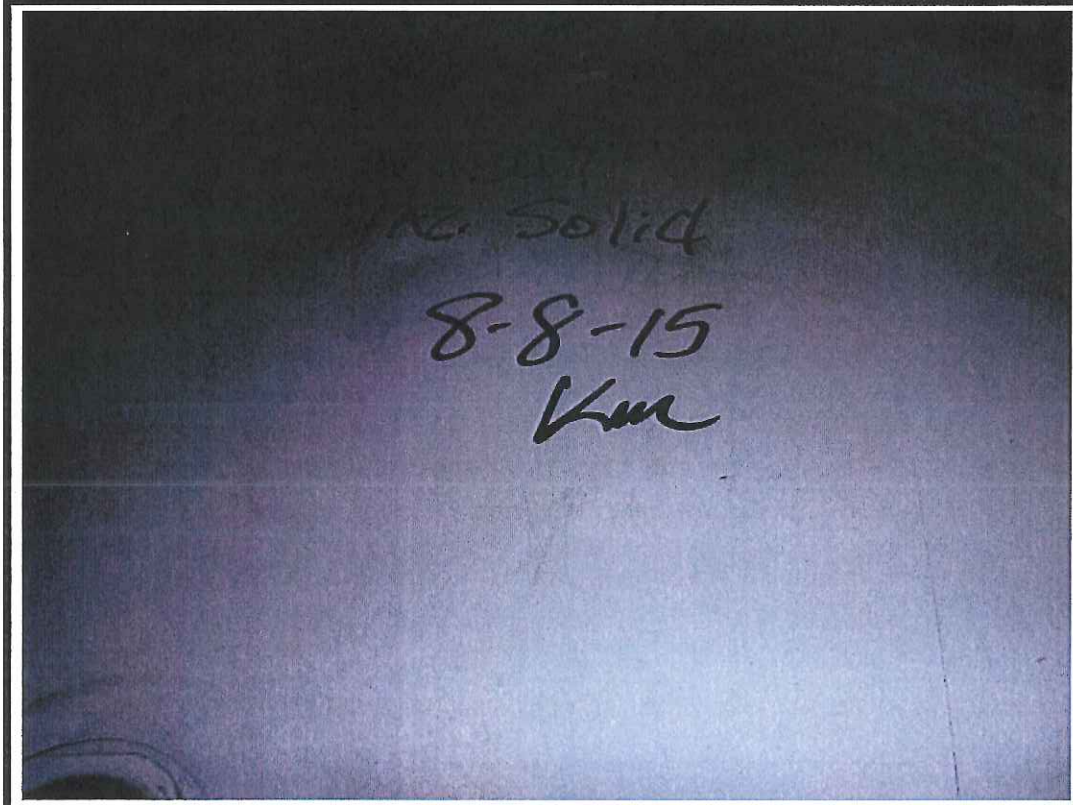
Hazardous waste drum stored  
on-site for greater than 90  
days.



Site: Pamarc Global Graphics  
(0890100008)  
Kane County

Photo ID: 5  
Photo Date: 2/13/2019  
Photo Time: 11:05:44  
Direction: Southwest  
Taken By: Tina Kovasznay

Hazardous waste drum stored  
on-site for greater than 90  
days.



Site: Pamarc Global Graphics  
(0890100008)  
Kane County

Photo ID: 6  
Photo Date: 2/13/2019  
Photo Time: 11:05:54  
Direction: South  
Taken By: Tina Kovasznay

Hazardous waste drum stored  
on-site for greater than 90  
days.





Site: Pamarco Global Graphics  
(0890100008)  
Kane County

Photo ID: 7  
Photo Date: 2/13/2019  
Photo Time: 11:06:03  
Direction: Southwest  
Taken By: Tina Kovasznay

Hazardous waste drum stored on-site for greater than 90 days. Date changed from 2015 to 2018.



Site: Pamarco Global Graphics  
(0890100008)  
Kane County

Photo ID: 8  
Photo Date: 2/13/2019  
Photo Time: 11:25:15  
Direction: East  
Taken By: Tina Kovasznay

Hazard waste accumulation tank.



Site: Pamarco Global Graphics  
(0890100008)  
Kane County

Photo ID: 9  
Photo Date: 2/13/2019  
Photo Time: 11:25:57  
Direction: East  
Taken By: Tina Kovasznay

Hazardous waste storage tank  
with no secondary  
containment.



Site: Pamarco Global Graphics  
(0890100008)  
Kane County

Photo ID: 10  
Photo Date: 2/13/2019  
Photo Time: 11:28:47  
Direction: East  
Taken By: Tina Kovasznay

Satellite accumulation of solid  
hazardous waste.